

# **EXHIBIT A-5**

## Walsh, Christine

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**From:** Lyle R. Hardman <lhardman@hsk-law.com>  
**Sent:** Friday, March 8, 2024 11:56 AM  
**To:** Walz, Bradley J.; Zierman, Autumn C.; Eric Wilkins  
**Cc:** Polak, Jonathan; Walsh, Christine; Jody Andrews  
**Subject:** RE: Correspondence being sent on behalf of Brad Walz | Taft File 111419.00006

It does, except for actual tax returns (but we're providing you with a summary of the tax information), and we'll produce copies of tax returns after a P.O. is entered.

  
**LYLE R. HARDMAN | PARTNER**  
205 W. Jefferson Blvd., Ste. 300  
South Bend, IN 46601  
P: 574.232.4801  
F: 574.232.9736  
Email: [lhardman@hsk-law.com](mailto:lhardman@hsk-law.com)

Lyle R. Hardman



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**From:** Walz, Bradley J. <BWalz@taftlaw.com>  
**Sent:** Friday, March 8, 2024 11:54 AM  
**To:** Lyle R. Hardman <lhardman@hsk-law.com>; Zierman, Autumn C. <AZierman@taftlaw.com>; Eric Wilkins <ewilkins@hsk-law.com>  
**Cc:** Polak, Jonathan <JPolak@taftlaw.com>; Walsh, Christine <CWalsh@taftlaw.com>; Jody Andrews <jandrews@hsk-law.com>  
**Subject:** RE: Correspondence being sent on behalf of Brad Walz | Taft File 111419.00006

Thanks Lyle. That includes all responsive documents as well, correct?

Brad

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**From:** Lyle R. Hardman <[lhardman@hsk-law.com](mailto:lhardman@hsk-law.com)>  
**Sent:** Friday, March 8, 2024 9:32 AM  
**To:** Walz, Bradley J. <[BWalz@taftlaw.com](mailto:BWalz@taftlaw.com)>; Zierman, Autumn C. <[AZierman@taftlaw.com](mailto:AZierman@taftlaw.com)>; Eric Wilkins <[ewilkins@hsk-law.com](mailto:ewilkins@hsk-law.com)>  
**Cc:** Polak, Jonathan <[JPolak@taftlaw.com](mailto:JPolak@taftlaw.com)>; Walsh, Christine <[CWalsh@taftlaw.com](mailto:CWalsh@taftlaw.com)>; Jody Andrews <[jandrews@hsk-law.com](mailto:jandrews@hsk-law.com)>  
**Subject:** RE: Correspondence being sent on behalf of Brad Walz | Taft File 111419.00006

The discovery is complete. It's with the clients for signature. I hope to have it to you early next week.

Lyle



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Lyle R. Hardman



**Insurance Law**  
South Bend, Indiana

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**From:** Walz, Bradley J. <[BWalz@taftlaw.com](mailto:BWalz@taftlaw.com)>  
**Sent:** Friday, March 8, 2024 10:30 AM  
**To:** Lyle R. Hardman <[lhardman@hsk-law.com](mailto:lhardman@hsk-law.com)>; Zierman, Autumn C. <[AZierman@taftlaw.com](mailto:AZierman@taftlaw.com)>; Eric Wilkins <[ewilkins@hsk-law.com](mailto:ewilkins@hsk-law.com)>  
**Cc:** Polak, Jonathan <[JPolak@taftlaw.com](mailto:JPolak@taftlaw.com)>; Walsh, Christine <[CWalsh@taftlaw.com](mailto:CWalsh@taftlaw.com)>; Jody Andrews <[jandrews@hsk-law.com](mailto:jandrews@hsk-law.com)>  
**Subject:** RE: Correspondence being sent on behalf of Brad Walz | Taft File 111419.00006

Lyle:

I am checking in on the discovery responses. We have been patient but our patience is running out. We need full responses to our Interrogatories and Document Requests by March 15<sup>th</sup> or we will move to compel.

Sincerely,

Brad

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**From:** Lyle R. Hardman <[lhardman@hsk-law.com](mailto:lhardman@hsk-law.com)>  
**Sent:** Tuesday, February 27, 2024 12:31 PM  
**To:** Walz, Bradley J. <[BWalz@taftlaw.com](mailto:BWalz@taftlaw.com)>; Zierman, Autumn C. <[AZierman@taftlaw.com](mailto:AZierman@taftlaw.com)>; Eric Wilkins <[ewilkins@hsk-law.com](mailto:ewilkins@hsk-law.com)>  
**Cc:** Polak, Jonathan <[JPolak@taftlaw.com](mailto:JPolak@taftlaw.com)>; Walsh, Christine <[CWalsh@taftlaw.com](mailto:CWalsh@taftlaw.com)>; Jody Andrews <[jandrews@hsk-law.com](mailto:jandrews@hsk-law.com)>  
**Subject:** RE: Correspondence being sent on behalf of Brad Walz | Taft File 111419.00006

Thank you, Brad,

Lyle



**LYLE R. HARDMAN | PARTNER**  
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Lyle R. Hardman



Insurance Law  
South Bend, Indiana

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**From:** Walz, Bradley J. <[BWalz@taftlaw.com](mailto:BWalz@taftlaw.com)>  
**Sent:** Tuesday, February 27, 2024 1:29 PM  
**To:** Lyle R. Hardman <[lhardman@hsk-law.com](mailto:lhardman@hsk-law.com)>; Zierman, Autumn C. <[AZierman@taftlaw.com](mailto:AZierman@taftlaw.com)>; Eric Wilkins <[ewilkins@hsk-law.com](mailto:ewilkins@hsk-law.com)>  
**Cc:** Polak, Jonathan <[JPolak@taftlaw.com](mailto:JPolak@taftlaw.com)>; Walsh, Christine <[CWalsh@taftlaw.com](mailto:CWalsh@taftlaw.com)>; Jody Andrews <[jandrews@hsk-law.com](mailto:jandrews@hsk-law.com)>  
**Subject:** RE: Correspondence being sent on behalf of Brad Walz | Taft File 111419.00006

Dear Mr. Hardman:

We are open to discussing settlement, but before we can make an opening offer we need to see Noah's Arcade's annual sales and profit calculation from 2022 to the present. We asked for this information in our discovery requests. The sooner you provide that information and documentation to us, the sooner I can provide you with an opening settlement offer.

Sincerely,

Brad



**Bradley J. Walz**  
Partner  
[BWalz@taftlaw.com](mailto:BWalz@taftlaw.com)  
**Dir:** 612.977.8525  
**Tel:** 612.977.8400 | **Fax:** 612.977.8650  
2200 IDS Center  
80 South 8th Street  
Minneapolis, MN 55402-2157

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**Download vCard**  
**taftlaw.com**

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**From:** Lyle R. Hardman <[lhardman@hsk-law.com](mailto:lhardman@hsk-law.com)>  
**Sent:** Tuesday, February 27, 2024 8:35 AM  
**To:** Zierman, Autumn C. <[AZierman@taftlaw.com](mailto:AZierman@taftlaw.com)>; Eric Wilkins <[ewilkins@hsk-law.com](mailto:ewilkins@hsk-law.com)>  
**Cc:** Walz, Bradley J. <[BWalz@taftlaw.com](mailto:BWalz@taftlaw.com)>; Polak, Jonathan <[JPolak@taftlaw.com](mailto:JPolak@taftlaw.com)>; Walsh, Christine <[CWalsh@taftlaw.com](mailto:CWalsh@taftlaw.com)>; Jody Andrews <[jandrews@hsk-law.com](mailto:jandrews@hsk-law.com)>  
**Subject:** RE: Correspondence being sent on behalf of Brad Walz | Taft File 111419.00006

Dear Mr. Walz:

Thank you for your correspondence. As you know, we are relatively new to the case. In addition, we've had a significant number of files transferred internally due to an attorney departing the firm. Accordingly, and I apologize, responding to this discovery fell through the cracks. I will answer it as soon as possible, although it may not be by your deadline of Monday. Please let me know if that will be an issue.

In addition, I have broached possible settlement with my clients, and I am inquiring if there is any interest in trying to resolve this matter amicably instead of generating significant litigation costs. If there is, again, please let me know.

Sincerely,

Lyle R. Hardman

  
**LYLE R. HARDMAN | PARTNER**  
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Lyle R. Hardman



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**From:** Zierman, Autumn C. <[AZierman@taftlaw.com](mailto:AZierman@taftlaw.com)>  
**Sent:** Monday, February 26, 2024 4:58 PM  
**To:** Eric Wilkins <[ewilkins@hsk-law.com](mailto:ewilkins@hsk-law.com)>; Lyle R. Hardman <[lhardman@hsk-law.com](mailto:lhardman@hsk-law.com)>  
**Cc:** Walz, Bradley J. <[BWalz@taftlaw.com](mailto:BWalz@taftlaw.com)>; Polak, Jonathan <[JPolak@taftlaw.com](mailto:JPolak@taftlaw.com)>; Walsh, Christine <[CWalsh@taftlaw.com](mailto:CWalsh@taftlaw.com)>  
**Subject:** Correspondence being sent on behalf of Brad Walz | Taft File 111419.00006

Messrs. Hardman and Wilkins,

Please see the attached correspondence being sent on behalf of Bradley Walz.

Sincerely,  
Autumn Zierman



**Autumn C. Zierman**

Legal Assistant

AZierman@taftlaw.com

**Dir:** 612.977.8625

**Tel:** 612.977.8400 | **Fax:** 612.977.8650

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